

**KMZ Rosenman**  
**KATTEN MUEHLEN ZAVIS ROSENMAN**

575 Madison Avenue  
New York, NY 10022-2585  
212.940.8800 office 212.940.8776 fax

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October 10, 2002

**MICHAEL S. GORDON**  
michael.gordon@kmzr.com  
212.940.6666 212.894.5968 fax

DEPUTY

**By Facsimile**

Honorable J. Frederick Motz  
United States District Judge  
District of Maryland  
United States Courthouse  
101 W. Lombard Street  
Baltimore, Maryland 21201

- Re: (1) PracticeWorks, Inc., et al. v. Professional Software  
Solutions of Illinois, Inc., Civil No. JFM-02-1205 ✓  
(2) Practice Works, Inc., et al. v. Dental Medical  
Automation, Inc., Civil No. JFM-02-1206 \_\_\_\_\_

Dear Judge Motz:

We represent Plaintiffs PracticeWorks, Inc. and SoftDent, LLC ("Plaintiffs"). As the Court will recall, Plaintiffs have made motions for partial summary judgment and for partial judgment on the pleadings, which were opposed by Defendants Professional Software Solutions of Illinois, Inc. and Dental Medical Automation, Inc. ("Defendants"), and which were fully briefed on September 27, 2002. We make a joint request with counsel for Defendants to defer depositions that would otherwise have to be completed by the discovery deadline of October 31, 2002, until after Plaintiffs' motions have been decided. While the parties disagree as to the need for depositions in this case, they do agree that conducting and indeed concluding depositions while a potentially dispositive motion remains pending gives rise to the potential of wasted resources.

The parties already have exchanged document requests and interrogatories and have agreed that written responses and documents are due on October 16 for Plaintiffs and November 18 for Defendants, pending the Court's extension of the discovery cut-off beyond October 31.

Thank you for your consideration of this matter.

Respectfully submitted,

*Michael S. Gordon*  
Michael S. Gordon

New York

Charlotte

Chicago

Los Angeles

Newark

Palo Alto

Washington, DC

www.kmzr.com

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A Law Partnership including Professional Corporations

*Approved*  
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cc: Mark E. Wiemelt, Esq. (via facsimile)  
Law Offices of Mark E. Wiemelt, P.C.  
10 S. LaSalle St., Suite 3500  
Chicago, IL 60603

John M.G. Murphy, Esq. (via facsimile)  
Ober, Kaler, Grimes & Shriver  
120 East Baltimore Street  
Baltimore, Maryland 21202

Counsel for Defendants